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Clerk of Courts

United States District Court

Northern District of Georgia JAMES N. HATTEN, Clerk

15 Ted Turner Drive SW

Atlanta, Georgia 30303

327 Cranberry Meadow Road

Berwick, Maine 03901-2441

October 28, 2019

Re: In Re Equifax Inc. Customer Data Security
Breach Litigation Case No. 1:17-md-2800-TWT
(N.D.Ga.)

Dear Madam or Sir:

Enclosed please find materials that I have relating to my correspondence from and to Equifax as a result of the breach occurring in the Fall of 2018. I do so at the recommendation of Charlie Warzel, Opinion Writer of the New York Times, in the lead editorial of September 18, 2019. I enclose a copy of that opinion piece.

I document the time and other costs that I incurred in attempting to receive corrective action and remuneration for losses incurred as a result of the Equifax breach. I filed my letter with Equifax, containing supporting documentation, which I have not included here, in efforts to communicate with the companies providing credit services. I am willing to provide those documents if requested.

I enclose a copy of the certified mail to you as well, along with a copy of the letter receiving no confirmation of Equifax's receipt. However, I have since received a copy of Equifax Data Beach class Action Settlement.

I appreciate your and the Court's attention to this issue.

Respectfully submitted,



Anne Vaughan

Enc.

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JAMES N. HATTEN, Clerk
By: [Signature] Deputy Clerk

327 Cranberry Meadow Road
Berwick, Maine 03901
September 11, 2019

Equifax Data Breach Settlement
C/O JND Legal Administration
PO Box 91318
Seattle, WA 98111

Re: Request for Settlement Payment as a
Result of Breach of the Private Credit
Details of Anne Vaughan in Her Account
with Equifax

To Whom It May Concern:

I am seeking restitution at the hourly rate owing to the hours spent in my efforts to correct the matters that led to my initial loss of my private consumer information through your errors, and to the subsequent errors and delays caused by Equifax.

I note that reports relating to my credit account list several names for me. Please note however that the only name that is appropriately mine for all purposes is Anne Vaughan and is correctly spelled Anne Vaughan, not Vaughn, as your correspondence had it. Nor am I Anne Vaughan Vaughn, again as your correspondence had it. (I note the credit reports include other names. While my maiden name's initial is D and both the Social Security Administration and the State of Maine Driver's License system uses that, I do not routinely do so. But I never use the last name of my husband, which is Schore).

I document these matters, detailing the times and measures that your error required I take. I provide copies, although I know that you must have the details in your files. As a retired attorney (Temple Law

1985) I recognize that legal systems may work slowly, nonetheless, these hours that I now seek compensation for include the initial hours spent during the year and three quarters that I have waited for corrective compensation while what appears to be your delay resisting the many plaintiffs' claims. That delay adds to the need for expanded recompense.

July 27, 2019 Began this letter and the settlement form, after retrieving materials from storage and reviewing them.

The following itemized and otherwise numerous documents are copied and enclosed along with the estimated time I spent deciphering and responding to Equifax, TransUnion, and Experian.

Your Notice of Data Breach 10/13/17, received and reviewed.

My Letter requesting security freezes (2 pages) to Equifax, Experian, and Transunion, 10/21/17 : 1 hour

18 page Letter from Experian 11/7/17 seeking additional information. Reviewed and answered and identifying information provided, copy enclosed of driver's license and Medicare card (numbers removed).

My Letter to TransUnion 11/15/17 to a different address, caused by Equifax giving me the incorrect address of same in its earlier correspondence.

Second Letter 11/15/17 with returned envelope to TransUnion seeking corrective action, necessitated by Equifax's incompetence and misinformation about Transunion's address.

Envelope of Letter to TransUnion returned 11/17/17 owing to wrong address, provided by Equifax.

Letter with \$10 check to Experian 11/21/17 and instruction sheet from Experian

Response received addressed to Anne Vaughan Vaughn from Equifax 11/25/17 Confirmation # 7329048833. 3 pages. The letter states "the results of the dispute you recently filed with Equifax are complete". The letter continues with

"The results of our Reinvestigation We have reviewed your concerns and our conclusions are : The disputed address PO Box 2000 chester PA 19016 is currently not reporting on the Equifax credit file."

Response received addressed to Anne D Vaughn from Experian Consumer Fraud Assistance stating that this request has been processed and the check (from Anne Vaughan) was not being necessary was shredded. 2 pages. 11/29/17

Letter received addressed to Anne D Vaughn from Experian confirming placement of a security freeze on that personal credit report from Experian and providing a personal identification number (number deleted). The letter contained instructions as to how to remove a security freeze. 11/29/17. 4 pages.

TransUnion Consumer Relations, undated communication, 5 pages, confirmation of a freeze ordered 11/27/17, #15FFE83CF9C804

TransUnion Security Freeze confirmation online. Printouts reviewed and answered to ensure secure results of freeze so I could receive my pin number (deleted). Questions required were user name, password, secret question (what is your father's middle name?) Received 11/27/17.

Experian's report, also enclosed, received as a consequence of the breach, shows us to always have been in good financial standing.

Daily Monitoring of my credit card, loan and bank accounts since October 13, 2017 @ an hour per week for the 96 weeks following notice of the breach is 96 hours. This daily monitoring was for the most part provided by my husband, Niles Schore, whose affidavit is attached hereto and incorporated herein by reference. This amount assessed is eminently reasonable, considering that it addresses only the past two years, although the threat of future harm and the need for ongoing monitoring continues to date.

At \$20 per hour that amounts to :

\$1920.

Copying documents at least 1 hour:
\$20.

\$20.

Postage estimated

\$15.

Time estimated to review, compile, maintain, document, and correct the actions of the agencies involved at \$20 per hour, at least 15 hours:

\$300

Damages Claimed

\$.2255.

In closing, please understand that I remain angered by this horrific act of indifference to my financial security and its potential for adverse fiscal consequences to my younger husband and my 4 daughters and their families including 4 grandchildren. Your company, with its vast staff and multiple levels of researchers, storage systems and supervising personnel, with corporate agents in receipt of large salaries, attendant benefits and stock advantages, has violated me and made my life insecure. While your efforts to claim criminality are no doubt correct as far as they go, your corporate complicity is most likely

discoverable or alternatively apparent in the ease with which so much data for so many was lifted from you.

The greater part of my work life has been devoted to low income communities and individuals, as an attorney for Legal Services programs in Georgia and Pennsylvania. The many poverty issues that my clients endured were I trust treated with care and professionally and with zeal. This care appears not to be understood by you, in your disregard of the credit issues and the funds of those you were authorized to serve honestly.

That your agency has displayed its indifference to my needs, as well as those of the millions whose losses are also undoubtedly multiplied by that same carelessness and willful disregard of standards of care, is scarcely recompensed by a measly reward to your victims, of \$125. I seek the maximum dollar amount from you that these facts above stated can give me. I note that the daily monitoring referenced above continues by my husband, and the continuing cause for concern might provide a potential legal action against you, since you acknowledge there is no identification of the hacking agent who likely still possesses it through your inaction to secure my private information.

I am 83 years old and I should never have had to go through this, but especially at my age. But without a doubt, the anxiety that I have incurred is not being recognized in your settlements. You screwed up, and you should have to pay.

Please feel free to contact me with any questions at annenile@comcast.net or 207 715 0246.

Respectfully submitted,

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The greater part of my work life has been devoted to low income communities and individuals, as an attorney for Legal Services programs in Georgia and Pennsylvania. The many poverty issues that my clients endured were I trust treated with care and professionally and with zeal. This care appears not to be understood by you, in your disregard of the credit issues and the funds of those you were authorized to serve honestly.

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Please feel free to contact me with any questions at annenile@comcast.net or 207 715 0246.

Respectfully submitted,

What to Do to Get Justice From Equifax

Charlie Warzel

EQUIFAX had one job — keep its vast trove of personal financial information on millions of Americans secure. In 2017, the company failed spectacularly at that job when a hack compromised the information of more than 147 million people.

This July, Equifax settled a lawsuit with the Federal Trade Commission in response to that failure for up to \$700 million. A settlement website was created to allow those who had their information exposed by Equifax to file a claim to receive either free three-bureau credit monitoring for up to 10 years or up to \$125 if they already had credit monitoring, no documentation necessary.

News spread. Millions listened and inundated the settlement site with claims. A week later, I reported on some fine print in the settlement suggesting that Equifax had earmarked only \$31 million for claims, meaning that if all 147 million people affected by the breach filed a claim, they would each get just 21 cents.

Millions of consumers whose data was exposed have made claims for \$125. Now they're getting demands for more paperwork.

Two days later, the F.T.C. admitted this and urged victims instead to take the free credit monitoring. Activists and politicians, including Elizabeth Warren, excoriated the F.T.C., calling the initial settlement "misleading."

Last weekend, victims looking for their \$125 faced yet another indignity in the form of an email from the Equifax settlement team. The email — which looked so spammy the F.T.C. had to post an assurance on its website that it was legitimate — said that people looking for a cash reward must verify they have credit monitoring in place by Oct. 15, or their claims would be denied.

As one of the 147 million who had their personal information exposed (my weekend email was helpfully buried in the purgatory of Gmail's "Promotions" tab), the settlement high jinks are enraging to me. Worse yet, the bungled payouts may have long-term repercussions for the way Americans think about privacy.

"This deal makes me sick," Jay Edelson, a class-action lawyer who specializes in privacy cases, told me last week. "This is going to be most Americans' experience with privacy class-action suits. And their view is going to be, I assume, 'We were promised a lot and we're going to get nothing and that's how it'll always be.'"

Fortunately, experts say there are still things you can do if you feel frustrated and misled.

RESPOND TO THAT EQUIFAX SETTLEMENT EMAIL This may seem obvious, but the best thing you can do is make sure you find, open and respond to the Equifax email. Theodore H. Frank, a lawyer who specializes in class-action suits, told me this week that only 3 percent of the people who get class-action emails respond. But responding is important, because it shows real consumer interest in restitution.

You'll need to show proof that you have credit monitoring to be eligible for a cash settlement. But there's a chance you might have credit monitoring active even if you aren't aware of it. Many major credit cards actually provide a form of credit monitoring, so it's worth checking with your credit card company. If your company offers such monitoring, it's a loophole that might allow you to receive your piece of the settlement.

Granted, this requires some legwork. But giving up is exactly what the settlement team is hoping for when it sends out a suspect-looking email, Mr. Frank argued. "Boycotting this unfair settlement isn't doing anything. The settlement attorneys will still get paid, even if you don't," he said.

WRITE A LETTER TO THE COURT Before anyone can get his money, the court — specifically, the United States District Court for the Northern District of Georgia — has to approve the settlement. This, two class-action lawyers told me, is where victims have some real power to exert some influence. According to one lawyer familiar with the settlement, one of the factors the court looks at are objections in letters from victims.

These objections can come in many forms — you can find information on how to object in the FAQ section of the settlement website — and you can simply write a standard one-page letter. No legalese or lawyers necessary. "Courts actually read all the objections," one attorney said. Because most people are too intimidated to write in, a small percentage can go a long way. "Even if it's just 1,000 or 2,000 people, that can send a big message," the attorney said. The letter should be brief and outline the process, stressing that you feel deceived by the terms of the settlement — if you do.

Another option is to write your state attorney general to complain about the settlement. Multiple class-action lawyers I spoke with noted that a number of state attorneys general were part of this settlement and that inundating them with letters could ratchet up the pressure for them to push back.

The difficulty of this approach in most class-action suits is that people usually don't realize a settlement is unfair right away. Often, it's not until years later, when a check for a few cents arrives, that they'll realize they've been baited and switched, and then it's too late. Here, though, it's already obvious that the settlement is falling short.

FILE A FORMAL, LEGAL OBJECTION Then there's the heavy-lift option, which involves class-action lawyers like Mr. Frank. This process is likely to take time, as the objection will cite case law and make a formal argument to the settlement judge. Once these formal objections are filed, other victims can join them without needing to do as much legwork.

There are some serious downsides to filing a formal objection, according to Mr. Frank. Those who do could face long, aggressive depositions from Equifax's lawyers. Their financial records could be subpoenaed as well.

"The lawyers take these objections very personally," he said. "They have \$80 million in fees at stake. It's going to be really ironic when the lawyers who were fighting for the privacy of the class will harass them and invade their privacy to keep their money."

But, Mr. Frank argues, if people come out in droves with formal objections, it may lessen the burden for all victims. "It's like that meme where if 10,000 people storm Area 51, the government won't shoot them all," he said. "If enough people object, they probably won't get deposed. And if they do, well, you can look at it as a once-in-a-lifetime experience."

If all of this sounds elaborate, it is. But if you care about the future of privacy, the impact could be meaningful.

As Mr. Frank notes, this is ultimately about sending a message on behalf of millions of victims that protecting privacy does matter and that those who expose entrusted personal information owe victims real compensation. Not some bait-and-switch news release.

CHARLIE WARZEL is an Opinion writer at large.

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JAMES N. HATTEN, Clerk
Deputy Clerk

327 Cranberry Meadow Road
Berwick, Maine 03901
October 6, 2019

Equifax Data Breach Settlement
C/O JND Legal Administration
PO Box 91318
Seattle, WA 98111

Re: Request for Settlement Payment as a
Result of Breach of the Private Credit
Details of Anne Vaughan in Her Account
with Equifax filed September 11, 2019

To Whom it May Concern:

On September 11, 2019, I filed a request for payment with you as a result of breach. I mailed it certified, but have received no acknowledgement from you. I enclose a copy of the certified forms. Please respond and let me know the status, if you have received my documents. I thank you for your attention to this matter.

Sincerely,



Anne Vaughan

Enc.

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com

SEATTLE WA 98111
OFFICIAL USE

Certified Mail Fee	\$3.50	0073 10 Postmark Here 09/11/2019
Extra Services & Fees (check box and fee as appropriate)	\$0.00	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$2.20	
Total Postage and Fees	\$5.70	
Sent To		
Street and Apt. No., or PO Box No.		
City, State, ZIP+4®		
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions		

Certified
 (USPS Certified Mail #)
 (70190700000129655372) \$3.50
 Total \$5.70

Cash
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 (\$14.30)

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or scan this code with
 your mobile device:



or call 1-800-410-7420.

YOUR OPINION COUNTS

Receipt #: 840-50401365-3-3619534-2
 Clerk: 10



P.O. Box 105051
Atlanta, GA 30348

000003932 FEBR001101517113345 01 000000

Anne Vaughan Vaughn
327 Cranberry Meadow Rd
Berwick, ME 03901-2441

October 13, 2017

NOTICE OF DATA BREACH

Dear Anne Vaughn:

This letter follows up on the cybersecurity incident Equifax announced on September 7, 2017. At Equifax, our priorities with regard to this incident are transparency and continuing to provide timely, reassuring support to every consumer. You are receiving this letter because you are one of the 2.5 million additional potentially impacted U.S. consumers that has personal information that was potentially exposed, as described below.

What Happened

On July 29, 2017, Equifax discovered that criminals exploited a U.S. website application vulnerability to gain access to certain files. Upon discovery, we acted immediately to stop the intrusion. The company promptly engaged a leading, independent cybersecurity firm which has been conducting a comprehensive forensic review to determine the scope of the intrusion, including the specific data impacted. Equifax also reported the criminal access to law enforcement and continues to work with authorities. Based on the company's investigation, the unauthorized access occurred from mid-May through July 2017.

On September 7, 2017 Equifax notified U.S. consumers of the data security incident, including that approximately 143 million U.S. consumers were impacted. On October 2, 2017, following the completion of the forensic portion of the investigation of the incident, Equifax announced that the review determined that approximately 2.5 million additional U.S. consumers were potentially impacted. To minimize confusion, you are receiving this letter because you are one of the 2.5 million additional potentially impacted U.S. consumers.

What Information Was Involved

Most of the consumer information accessed includes names, Social Security numbers, birth dates, addresses, and in some instances, driver's license numbers. In addition to this notice, Equifax will send you a direct mail notice if your credit card number was impacted. We have found no evidence of unauthorized access to Equifax's core consumer or commercial credit reporting databases.

**Must be postmarked
or submitted online
NO LATER THAN
January 22, 2020**

**EQUIFAX DATA BREACH SETTLEMENT
C/O JND LEGAL ADMINISTRATION
P.O. BOX 91318
SEATTLE, WA 98111
WWW.EQUIFAXBREACHSETTLEMENT.COM**

EFX

Equifax Data Breach Claim Form For Class Members Who Were Minors on May 13, 2017

SETTLEMENT BENEFITS – WHAT YOU MAY GET

This claim form can be used to submit a claim on behalf of a class member whose personal information was impacted by the Equifax data breach announced on September 7, 2017, and who was under the age of 18 on May 13, 2017 ("Impacted Minors").

Use this claim form if one of the following circumstances applies to you:

- If your child was impacted by the data breach, and is still under the age of 18 on the date this claim form is submitted. Parents or legal guardians must submit claim forms on behalf of individuals who are still minors.
- If you were impacted by the data breach, and you are now over the age of 18 on the date you submit this claim form. If you are over the age of 18, only you or your authorized representative can submit a claim form on your behalf.

If you were over the age of 18 on May 13, 2017, and wish to file a claim form, visit www.EquifaxBreachSettlement.com. Do not use this claim form.

You may submit a claim for one or more of these benefits:

Credit monitoring or \$125 Cash Payment: Use the claim form to request free credit monitoring services. Or, if you or your child already have credit monitoring services, you can request a \$125 cash payment.

Cash Reimbursement. Use the claim form to request money for one or more of the following:

1. **Reimbursement for Time Spent.** If you or your child spent time trying to avoid or recover from fraud or identity theft because of the Equifax data breach, you can get \$25 per hour for up to 10 total hours, or up to 20 total hours if you provide supporting documents.
2. **Reimbursement for Money You Spent.** If you or your child spent money trying to avoid or recover from fraud or identity theft because of the Equifax data breach, you can be reimbursed up to \$20,000. You must submit documents supporting your claim.
3. **Up to 25% Reimbursement for Equifax Credit Monitoring Subscriptions.** If you or your child had an Equifax credit monitoring or identity theft protection subscription between 9/7/2016 and 9/7/2017, you can get a payment of 25% of the amount you paid.

By filling out the boxes below, you are certifying that the time you spent doesn't relate to other data breaches.

Questions? Visit www.EquifaxBreachSettlement.com or call 1-833-759-2982

5. YOUR PHONE NUMBER:	207-715-0246
6. YOUR EMAIL ADDRESS:	annhenile@comcast.net
7. YEAR OF BIRTH (REQUIRED)	Enter your year of birth if filling out for yourself or enter your child's year of birth if filling out this form on behalf of a minor. February 21, 1936

Credit Monitoring: Free Service or Cash Payment

You may be eligible to receive free credit monitoring or up to \$125 if you already have credit monitoring.

An Impacted Minor can receive free monitoring services provided by Experian for at least four years. While an Impacted Minor is under the age of 18, the services will be child monitoring services. Once an Impacted Minor has turned 18, the services will be the same three-bureau monitoring at all three national credit agencies (Equifax, Experian, and TransUnion) offered to adults. An Impacted Minor can also receive free monitoring services provided by Equifax for up to fourteen years after the Experian service ends. Again, while an Impacted Minor is under the age of 18, the services will be child monitoring services tailored to minors. Once an Impacted Minor has turned 18, the services would be the same single-bureau monitoring offered to adults.

Or, if the Impacted Minor has credit monitoring services that the Impacted Minor will keep for at least six months, you can request a cash payment of \$125.

Please select either Option 1 or Option 2 below, but not both.

- ☐ **Option 1, Credit Monitoring:** I want to receive free, three-bureau credit monitoring for myself or my child.

If you select this option, you will be sent instructions and an activation code after the settlement is final to your email address or home address. You won't be "upsold" any services by enrolling or otherwise asked to submit any payment for these services now or in the future.

If You selected Option 1, would you like to sign-up for Equifax's free, one-bureau credit monitoring service for up to 14 more years after the initial, three-bureau credit monitoring services expire?

- ☐ Yes.

If you select "yes" for this option, you will be sent instructions to your email address or your home address before your three-bureau credit monitoring expires. You won't be "upsold" any services by enrolling or otherwise asked to submit any payment for these services now or in the future.

- ☐ **Option 2, Cash Payment:** I want a cash payment of \$125. I certify that I have credit monitoring for myself or my child and will have it for at least 6 months from today.

If you select this option, you cannot also enroll in the free, three-bureau credit monitoring service offered through this Settlement.

Cash Payment: Money You Lost or Spent

If you or your child lost or spent money trying to prevent or recover from fraud or identity theft caused by the Equifax data breach and have not been reimbursed for that money, you can receive reimbursement for up to \$20,000 total.

It is important for you to send documents that show what happened and how much you lost or spent, so that you can be repaid (except for money you may have spent on Equifax subscription products as explained below). If they are the same as the documents you attached in the section above, you do not need to send them again.

To look up more details about how cash payments work, visit www.EquifaxBreachSettlement.com or call toll-free 1-833-759-2982. You will find more information about the types of costs and losses that can be paid back to you, what documents you need to attach, and how the Settlement Administrator decides whether to approve your payment.

Loss Type and Examples of Documents	Amount and Date	Description of Loss or Money Spent and Supporting Documents (Identify what you are attaching, and why it's related to the Equifax breach)
Costs for freezing or unfreezing your credit report on or after 9/7/2017 <i>Examples: Receipts, notices, or account statements reflecting payment for a credit freeze</i>	\$ Date:	<i>all attached</i> <i>if</i>
Credit monitoring and identity theft protection purchased between 9/7/2017 and the date of your claim submission <i>Examples: Receipts or statements for credit monitoring services</i>	\$ Date:	<i>letter & attachments</i> <i>attached</i> <i>since 9/11/19</i>
Costs incurred for an Equifax credit or identity theft monitoring subscription products I had between 9/7/2016 and 9/7/2017 <i>Equifax will check its records and these claims will be paid without documentation if Equifax's records match your claim. You may still submit receipts of statements for Equifax credit monitoring services to support your claim.</i>	\$ Date:	

Signature

I affirm under the laws of the United States that the information I have supplied in this claim form and any copies of documents that I am sending to support my claim are true and correct to the best of my knowledge.

Check one:

☐ I affirm that I am the parent or legal guardian of the child listed below, and that I am filing a claim on his or her behalf.

Child's Name: _____

OR

☒ I am filling out this claim form on my own behalf, and I am over the age of 18.

I understand that I may be asked to provide more information by the claims administrator before my claim is complete.

Signature:

Anne Vaughan

Dated:

9/11/19

Print Your Name:

Anne Vaughan

Costs, expenses, and losses due to identity theft, fraud, or misuse of your personal information on or after 05/13/2017 <i>Examples: Account statement with unauthorized charges highlighted; police reports; IRS documents; FTC Identity Theft Reports; letters refusing to refund fraudulent charges; credit monitoring services you purchased</i>	\$ Date:	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
Professional fees paid to address identity theft on or after 5/13/2017 <i>Examples: Receipts, bills, and invoices from accountants, lawyers, or others</i>	\$ Date:	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <p><i>All attached letters to Vaughan 2/9/19</i></p>
Other expenses such as notary, fax, postage, copying, mileage, and long-distance telephone charges related to the data breach <i>Examples: Phone bills, receipts, detailed list of places you traveled (i.e. police station, IRS office), reason why you traveled there (i.e. police report or letter from IRS re: falsified tax return) and number of miles you traveled</i>	\$ Date:	<hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>

How You Would Like to Receive Your Cash Payment

If you made a claim for a cash payment in this claim form, you can elect to receive your payment either by check or pre-paid card to your mailing address.

Checks must be cashed within 90 days. If you select a pre-paid card, the card never expires.

Which do you prefer?

☒ Check

☐ Pre-Paid Card

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U.S.D.C. - Atlanta

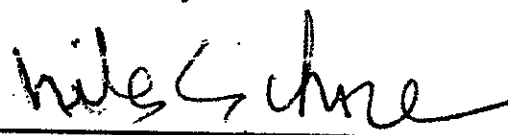
NOV - 4 2019

JAMES N. HATTEN, Clerk
Deputy Clerk

Affidavit

I, Niles Schore, retired attorney, aver as follows:

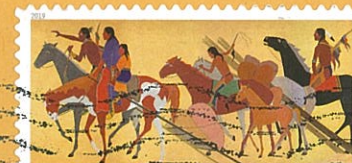
1. I am the husband of Anne Vaughan.
2. I consistently on a daily basis monitored the status of our funds and searched for, tracking the existence of, any damages to our mutual accounts caused by the breach of my wife's personal credit information by Equifax that led to the efforts which my wife has had to undertake and which she has outlined in her letter of September 11, 2019.
3. The amount of time I spent weekly is correct, to September 11, 2019.
4. The modest monetary value I assign to the monitoring work is based on my experience.
4. My monitoring effort of the Equifax breach consequences to my wife's personal credit information continues to this day and will continue indefinitely.



Niles Schore



Anne Vaughan
327 Cranberry Meadow Rd
Berwick, ME 03901



POST OFFICE NATIONALS / FOREVER / 100

SOL. MAINE FINEST ART
ELLSWORTH KELLY

WED 30 OCT 2019

Clerk of Courts
United States District Court
Northern District of Georgia
75 Ted Turner Drive SW
Atlanta
Georgia
30303

